

Response to FTX Recovery Trust's 173rd Omnibus Objection

Case No. 22-11068 (KBO)

Submitted by: Joseph Hickey

Claim Number: 99478

Dated: May 27, 2025

RECEIVED

2025 JUN -4 AM 9:04

CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

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Joseph Hickey

jhickeys@gmail.com

445 Miller Creek Rd

San Rafael, CA 94903

RECEIVED
2025 JUN -4 AM 9:04
CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

Dated: May 27, 2025

Clerk of the Court

United States Bankruptcy Court

District of Delaware

824 Market Street, 3rd Floor

Wilmington, DE 19801

Re: Response to FTX Recovery Trust's 173rd Omnibus Objection to Certain Late Filed
Proofs of Claim (Customer Claims)

Case No.: 22-11068 (KBO)

Claimant: Joseph Hickey

Claim Number: 99478

Debtor: FTX Trading Ltd.

To the Honorable Chief Judge Owens:

I respectfully submit this Response in opposition to the FTX Recovery Trust's objection to my proof of claim (Claim No. 99478), which was filed on February 4, 2025, after the official customer bar date of September 29, 2023.

While I acknowledge the timing of my submission, I respectfully request that the Court

consider the extenuating circumstances which prevented me from filing earlier. Specifically, I faced prolonged account access restrictions through Liquid (formerly Quoine Pte. Ltd.), the platform where my assets were held.

As a U.S.-based user, my access to Liquid had been restricted, and I was unable to retrieve the necessary information about my holdings in order to submit a complete and accurate claim. I attempted to resolve these issues through Liquid's support team, and was eventually granted limited access in early February 2025.

On February 3, 2025, I contacted Liquid's Head of Customer Support to confirm my account status and inquire about next steps. I filed my claim the very next day.

I have attached documentation showing my repeated, good-faith efforts to access my account and file a claim:

- Exhibit A: Email from Liquid's Head of Support confirming my account was banned due to U.S. residency.
- Exhibit B: Support correspondence from December 2024 through February 2025 showing my efforts to reset 2FA, complete KYC, and confirm my balances.
- Exhibit C: My claim submission receipt dated February 4, 2025.
- Exhibit D: Screenshot of balances.

This timeline demonstrates that I took diligent action and filed promptly once circumstances beyond my control were resolved. I respectfully request that my claim be allowed and considered on the merits.

Thank you for your time and consideration.

Sincerely,
Joseph Hickey

Exhibit A

Email from Liquid's Head of Support (Jason Gunn) confirming U.S.-based users were banned from accessing Liquid accounts. Dated December 2024.



Joe Hickey <jhickeysw@gmail.com>

Trouble accessing account

Jason Gunn <jason.gunn@liquid.com>
To: Joe Hickey <jhickeysw@gmail.com>

Mon, Dec 9, 2024 at 9:56 PM

Hello

I have been allowed to unban your account, you can log in with your correct credentials

Regarding Withdrawal - this wont be possible until the final decision is made and the process complete

Regards

Jason Gunn

Head of Customer Support

www.liquid.com

QUOINE Pte. Ltd. / QUOINE Corporation

Blockchain - Exchange - Payment - Wallet

jason.gunn@liquid.com

On Tue, Dec 10, 2024 at 8:03AM Joe Hickey <jhickeysw@gmail.com> wrote:

Hi Jason,

Thank you for all of this context. I appreciate it and was unaware of that reason for the ban.

Would you mind consulting with your legal team on this? It'd be helpful to understand my options for:

1. Gaining visibility into my account
2. Accessing my account and/or transferring funds (assuming I'm unable to use Liquid in the USA)

Appreciate your help and support on this.

Cheers,
Joe

On Mon, Dec 2, 2024 at 11:50 PM Jason Gunn <jason.gunn@liquid.com> wrote:

The reason that your account is banned is because you are from the US and we have not been allowed to support users from there for about 5 years, communication was sent to everyone for the few months running up to that to ask you to withdraw any funds

As you would be aware, due to the FTX Bankruptcy, Liquid is a subsidiary of FTX, all transactions such as deposits and withdrawals have been suspended

I will need to consult legal to ask if ok to unban YS people

Regards

Jason Gunn

Head of Customer Support

www.liquid.com

QUOINE Pte. Ltd. / QUOINE Corporation

Blockchain - Exchange - Payment - Wallet

jason.gunn@liquid.com

On Mon, Nov 25, 2024 at 12:25PM Joe Hickey <jhickeysw@gmail.com> wrote:




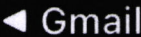
Hi Jason,

I just followed the steps you shared, received the email confirmation, attempted to sign in, and received the attached notification saying my account is banned.


I've never received previous indication of my account being banned. How do you advise I regain access?

Thanks,
Joe

8:21



Login

 URL verification: <https://app.liquid.com>


Please check the URL carefully.

Email Address

jhickeysw@gmail.com

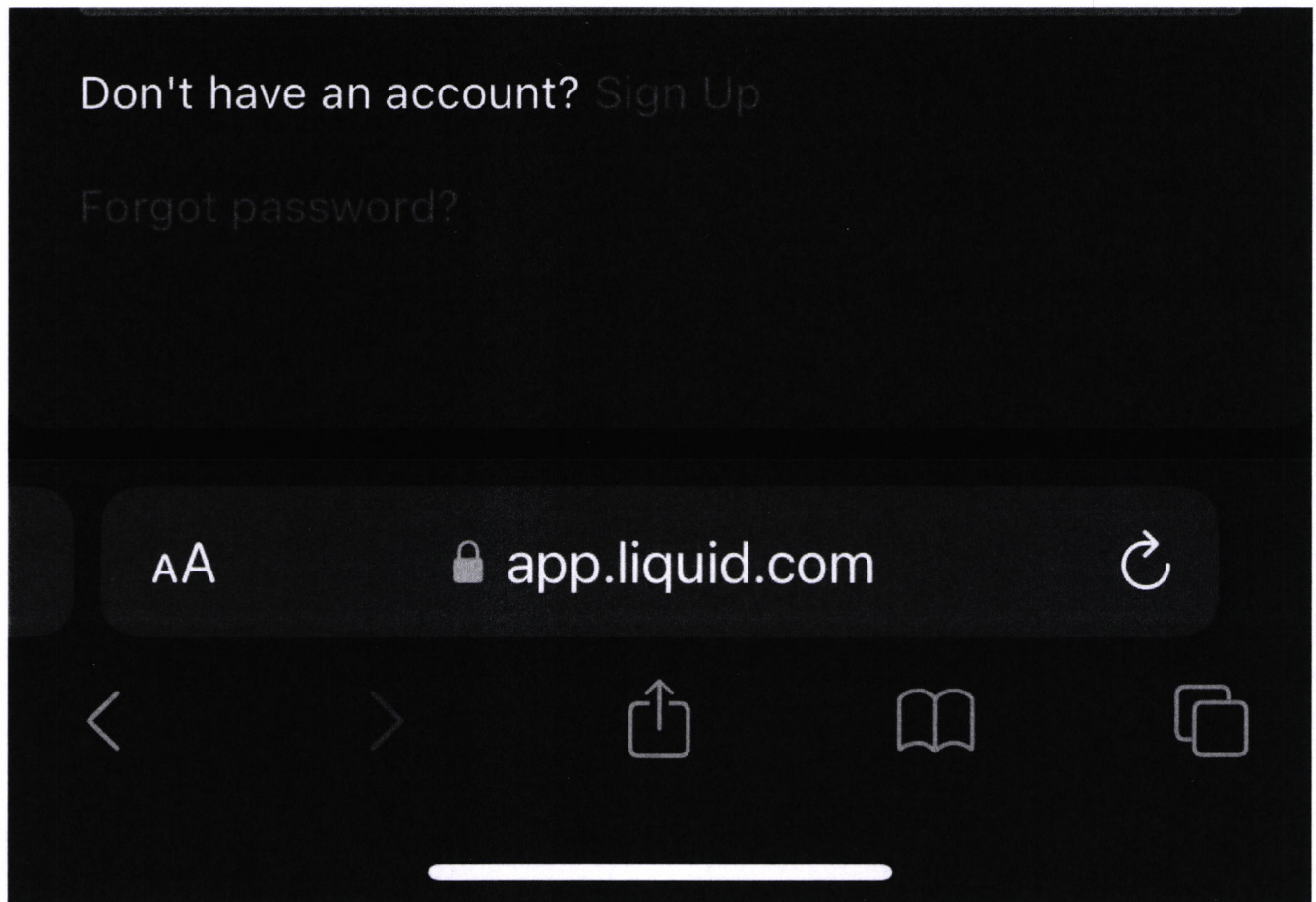
Password

●●●●●●●●●●



Your account has been banned. Please contact our [Customer Support](#).

Sign In



On Sun, Nov 24, 2024 at 4:51 PM Jason Gunn <jason.gunn@liquid.com> wrote:

Please make sure that it is here - <https://app.liquid.com/sign-in/> - you are trying to sign in to, not anything that mentioned Custodiem, the confirmation email should then reach your email box

Regards

Jason Gunn

Head of Customer Support

www.liquid.com

QUOINE Pte. Ltd. / QUOINE Corporation

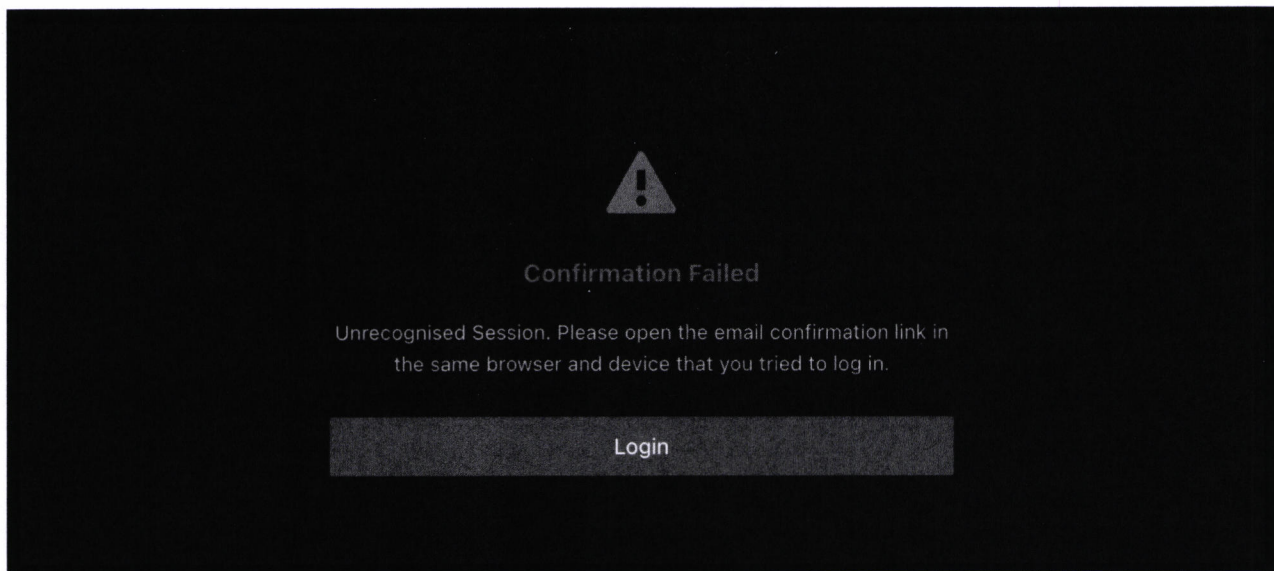
Blockchain - Exchange - Payment - Wallet

jason.gunn@liquid.com

On Sat, Nov 23, 2024 at 4:21 PM Joe Hickey <jhickeysw@gmail.com> wrote:

Hi Liquid Team,

I've been attempting to access my account this evening and have been unable to. I continue to receive this notification:



Please advise.

Cheers,
Joe

Exhibit B

Support correspondence from December 2024 through February 2025 showing multiple interactions with Liquid and FTX to resolve 2FA, complete KYC, and regain access to account information.



Joe Hickey <jhickeysw@gmail.com>

[Please use support.ftx.com] Re: No longer have access to multi-factor authenticator (2FA)

Jason Gunn <jason.gunn@liquid.com>
To: Joe Hickey <jhickeysw@gmail.com>

Tue, Feb 11, 2025 at 2:00 AM

If you filed the claim via the Kroll website, which you would have to do as your balances dont show on Liquid, the balances wont show on the Claims Portal

So as long as you did everything ok on the Kroll site then you should follow the Kroll site, as well as the portal for updates

Regards

Jason Gunn

Head of Customer Support

www.liquid.com

QUOINE Pte. Ltd. / QUOINE Corporation

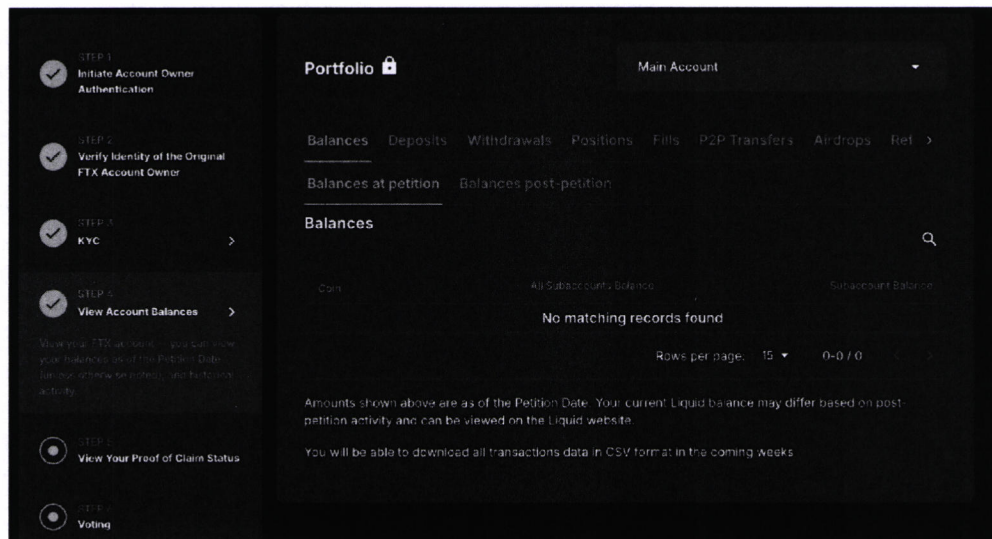
Blockchain - Exchange - Payment - Wallet

jason.gunn@liquid.com

On Tue, Feb 11, 2025 at 7:14AM Joe Hickey <jhickeysw@gmail.com> wrote:

Hi Jason,

If I've submitted my claim correctly, would this view within the FTX claims portfolio view reflect my balances?



Thanks,
Joe

On Mon, Feb 3, 2025 at 10:01 PM Joe Hickey <jhickeysw@gmail.com> wrote:

Thank you for your support, Jason. I really appreciate it. I've submitted my claim and hope to receive a positive response soon.

Cheers,
Joe

On Mon, Feb 3, 2025 at 6:29 PM Jason Gunn <jason.gunn@liquid.com> wrote:

Id have to be really honest Joe, I would say so but I am not 100% sure and I dont want to mis-guide you

Of the choices that would make sense but match see if can ask or research to make sure

Regards

Jason Gunn

Head of Customer Support

www.liquid.com

QUOINE Pte. Ltd. / QUOINE Corporation

Blockchain - Exchange - Payment - Wallet

jason.gunn@liquid.com

On Tue, Feb 4, 2025 at 9:19AM Joe Hickey <jhickeysw@gmail.com> wrote:

Hey Jason,

Thank you again - appreciate all of your help. Hopefully my last question here for a while. Just wanting to ensure inputting these amounts under the correct type.

Are these balances considered "asserted" crypto?

7. List the quantity of each type of cryptocurrency ("Crypto") or fiat currency ("Fiat") held in your account(s) as of November 11, 2022. List any Non-Fungible Tokens ("NFTs") held in your account (s) along with the unique identification code.

- Note that the "USD Rate" is the ratio of the Local Currency to U.S. Dollars.
- If your Crypto or Fiat were part of the peer-to-peer ("P2P") margin lending program, please populate the Loaned Quantity column.

• Fiat

• Loaned Fiat

• Asserted Crypto

• Loaned Crypto

• Staked Crypto

• NFTs

Cheers,

Joe

On Mon, Feb 3, 2025 at 5:00 PM Jason Gunn <jason.gunn@liquid.com> wrote:

Hello

Here is the balances you had on Liquid

LTC - 0.00021656

XRP - 2172.339028

BTC - 0.00000045

Hope that helps

Regards

Jason Gunn

Head of Customer Support

www.liquid.com

QUOINE Pte. Ltd. / QUOINE Corporation

Blockchain - Exchange - Payment - Wallet

jason.gunn@liquid.com

On Tue, Feb 4, 2025 at 8:47AM Joe Hickey <jhickeysw@gmail.com> wrote:

Hi Jason,

This is super helpful and I've begun filling out my claim in the Kroll portal per your recommendation.

Going back to my previous email, I wanted to confirm with you my balance in Liquid. It is currently reflecting a zero balance but I believe that to be due it's frozen state. This old help article seems to indicate in

scenario 1 that it can be restored back to its previous status so that I can see my balance, though I know you previously stated there may be issues in doing this with a US based account.

Just want to make sure I'm filing with the correct balance information and not inputting misinformation.

Thank you, Jason.

Cheers,
Joe

On Mon, Feb 3, 2025 at 4:10 PM Jason Gunn <jason.gunn@liquid.com> wrote:

The deadline for filing customer claims was on September 29, 2023 but.....

The Kroll Portal will remain accessible after the Bar Date to amend or file a claim. Absent order from the U.S. Bankruptcy Court for the District of Delaware, any claims filed after the Bar Date will be considered late filed and may be disputed. KYC will also remain open for customers to complete and upload the requested documentation.

As referenced in the Kroll Customer Bar Date FAQs [restructuring.ra.kroll.com] and prior correspondence from Kroll, customers may file Customer Claims directly on the Kroll portal by visiting <https://ftx-forms.ra.kroll.com/efiling/fr/410/customer-claim-form/new>.

PLEASE NOTE: Kroll is the Bankruptcy Court appointed claims and noticing agent for FTX Trading Ltd. and 101 affiliated debtors' chapter 11 cases. As such, they are not permitted to provide legal or financial advice to any third parties. Further, Kroll is not permitted to accept claims via email or fax, and any such information provided via either of these methods will not constitute a claim in these proceedings. You may wish to consult your own attorney to assist. Please review the Customer Bar Date FAQs for further details about Customer Claims.

Thank you,

Jason Gunn

Head of Customer Support
www.liquid.com
QUOINE Pte. Ltd. / QUOINE Corporation
Blockchain - Exchange - Payment - Wallet
jason.gunn@liquid.com

On Tue, Feb 4, 2025 at 2:34AM Joe Hickey <jhickeysw@gmail.com> wrote:
Hey Jason,

Thank you! I was able to get access and start the KYC process. Thank you. Unfortunately though I'm seeing the proof claim period has elapsed.

- With my account frozen, are you able to confirm my balance in Liquid? I want to confirm it matches my records.
- Do you have any recommended actions I can take at this time to file my claim?

Your help is much appreciated.

Cheers,
Joe

On Mon, Feb 3, 2025 at 1:13AM Jason Gunn <jason.gunn@liquid.com> wrote:
Hi Joe

Can you try again, I made a quick change on your account, so lets check that

it may take a few hours to kick in, so try a couple of times

Regards

Jason Gunn

Head of Customer Support
www.liquid.com
QUOINE Pte. Ltd. / QUOINE Corporation
Blockchain - Exchange - Payment - Wallet
jason.gunn@liquid.com

On Mon, Feb 3, 2025 at 3:55 PM Joe Hickey <jhickeysw@gmail.com> wrote:
Hi Jason,

I've reset my 2fa multiple times now and have tried two different authenticator apps (Google Authentication and Duo Mobile). The tokens work while in Liquid but are not working when attempting to input the token on the Claims FTX site.

Please advise how we can troubleshoot this so that I can provide my KYC information.

Thanks,
Joe

On Fri, Jan 31, 2025 at 5:03 PM Jason Gunn <jason.gunn@liquid.com> wrote:
Sincere apologies for the delay, your 2FA has now been disabled, you can now log onto <https://app.liquid.com/sign-in/> and set up another 2FA so that you can log onto the FTX Claims Portal

We also highly recommend you save the back-up codes in either QR or text format in case you lose your 2FA device and need to re-enable 2FA with a new phone.

Here's a useful Liquid article on 2FA: [How to set up 2-factor authentication?](#)

Warm regards

Jason Gunn

Head of Customer Support
www.liquid.com
QUOINE Pte. Ltd. / QUOINE Corporation
Blockchain - Exchange - Payment - Wallet
jason.gunn@liquid.com

On Sat, Feb 1, 2025 at 1:40AM Joe Hickey <jhickeysw@gmail.com> wrote:
Hi Support Team,

Following up on my most recent inquiry. Your support is greatly appreciated.

Thanks,
Joe

On Thu, Jan 30, 2025 at 11:23AM Joe Hickey <jhickeysw@gmail.com> wrote:
I've now set up 2FA in Liquid and can login with it there. The 2FA is being rejected when attempting to apply it in claims.ftx.com/login.

Please advise.



Invalid email,
password or code



Thanks,
Joe

On Thu, Jan 30, 2025 at 2:33AM <support-c8ms20@ftexchange.zendesk.com> wrote:

~~##~~ Please type your reply above this line ~~##~~

Your request (275755) has been updated.

To add additional comments, reply to this email.



Renee (Please use support.ftx.com)

Jan 30, 2025, 02:33 PST

Hello Joe,

I understand. The FTX Claims Portal requires 2FA for logging in. Since it uses the same logins on your Liquid account, you will need to set-up 2FA on Liquid first. Once done, you should then be able to login to the FTX Claims Portal.

Thank you,

FTX Customer Support



Joe Hickey

Jan 29, 2025, 21:46 PST

For clarification, I'm able to login to my Liquid account without 2FA. When attempting to login to Claims.ftx/login for "Liquid Account Authentication and Validation", I'm asked to enter a six digit code which I have no way of receiving due to having 2FA disabled.

Two-factor authentication required

Please enter a 6-digit verification code from your Google Authenticator or Authy app.

[Click here to visit support.](#)

Submit

Your support for proceeding here would be greatly appreciated.

Thanks,
Joe

On Wed, Jan 29, 2025 at 9:24 PM Joe Hickey <jhickeysw@gmail.com> wrote:

I have reached out to support@liquid.com multiple times in an effort to reset/disable my 2FA and I've not received a response. I appear to have lost access to my MFA, which I need to resolve in order to provide my KYC information.

Your support would be greatly appreciated.

Thank you!
Joe



Joe Hickey

Jan 29, 2025, 21:24 PST

I have reached out to support@liquid.com multiple times in an effort to reset/disable my 2FA and I've not received a response. I appear to have lost access to my MFA, which I need to resolve in order to provide my KYC information.

Your support would be greatly appreciated.

Thank you!
Joe

**Renee (Please use support.ftx.com)**

Jan 20, 2025, 00:01 PST

Hello,

If you need assistance with resetting your 2FA or password, or updating your email address, please reach out to Liquid at support@Liquid.com to have these updated before logging in to the FTX Claims Portal.

If you are able to login to the Liquid platform, you should be able to login to the FTX Claims Portal using the same credentials. If you previously ran into an error, please try again today and let us know if you continue to run into an issue.

Thank you,

FTX Customer Support

**Joe Hickey**

Jan 17, 2025, 08:51 PST

Thanks for the reply. I need assistance resetting my 2fa method. Please advise.

Cheers,
Joe

**Renee (Please use support.ftx.com)**

Jan 17, 2025, 07:13 PST

Hello,

Thank you for reaching out.

I'm sorry to hear that you are running into issues logging in to the FTX Claims Portal.

Please make sure that you are using the same username, password and 2FA method that you are using to login to your Liquid account, and that these credentials still work on the Liquid platform. If you need assistance with resetting your 2FA or password, or updating your email address,

please reach out to Liquid at support@Liquid.com to have these updated before logging in to the FTX Claims Portal.

If you are able to login to the Liquid platform, you should be able to login to the FTX Claims Portal using the same credentials. If you previously ran into an error, please try again today and let us know if you continue to run into an issue.

Thank you,

FTX Customer Support



Joe Hickey

Jan 17, 2025, 06:46 PST

jhickeys@gmail.com

Hi Support Team,

Following up as I didn't receive a response here. I appear to have lost access to my MFA, which I need to resolve in order to provide my KYC information.

Thank you!

Joe

On Tue, Dec 3, 2024 at 12:43 PM Joe Hickey <jhickeys@gmail.com> wrote:

Hi Support Team,

I'm attempting to view my funds in my Liquid account via <https://claims.ftx.com/login>. As part of this "recovery user login process" I'm asked to input my 2fa, which I don't have setup.

This FTX support page shares the following:

Please contact Customer Support at support@ftx.com. You may be asked to answer a few questions about your account. You may be required to complete KYC/Liveness Check during this process.

Are you able to assist so that I can regain access to 2fa and ultimately access my account? Please advise.

Thank you.

Joe

This email is a service from Please use support.ftx.com. Delivered by Zendesk

[N5NJG4-9DY25]

Exhibit C

Claim submission receipt showing that the proof of claim was filed on February 4, 2025 via the Kroll Portal.

Customer Claim Form

File a Proof of Claim

To file a proof of claim electronically, please enter the creditor's name and an email address (where filing confirmation will be sent) in the fields below.

Creditor Name

Joseph Hickey

Email Address

jhickeys@gmail.com

EPOC Agreement

The information requested on the proof of claim form is being collected for the purposes of facilitating a voluntary petition for relief under the Bankruptcy Code and processing any claim you may have against the Debtors.

YOUR PROOF OF CLAIM FORM MUST NOT CONTAIN ANY OF THE FOLLOWING: (i) medical records, (ii) complete social security numbers or tax identification numbers, (iii) a complete birth date, (iv) the name of a minor or (v) a financial account number. The information requested on the proof of claim form is being collected for the purposes of facilitating a debtor's voluntary petition for relief under the U.S. Bankruptcy Code and processing any claim you may have against such debtor. When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services to avoid the disclosure of confidential health care information.

SOME OR ALL OF THE INFORMATION YOU PROVIDE ON THE PROOF OF CLAIM FORM WILL BE PUBLICLY DISPLAYED AND/OR ACCESSIBLE ON THE DEBTOR'S CASE WEBSITE HOSTED BY KROLL RESTRUCTURING ADMINISTRATION (FORMERLY KNOWN AS PRIME CLERK) PURSUANT TO APPLICABLE LAW AND/OR COURT ORDER. Additionally, such information may be shared with certain third parties affiliated with this matter in furtherance of the bankruptcy case and process. Although you may have certain rights relating to the information provided on the proof of claim form under certain laws, applicable law or court order may prohibit the amendment or erasure of such information once it is submitted, including information displayed and/or accessible at the case website.

PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM.

ALL DOCUMENTS SUBMITTED, INCLUDING ANY MEDICAL RECORDS, WILL BE MADE PUBLICLY AVAILABLE ON THE DEBTOR'S CASE WEBSITE AND/OR THE BANKRUPTCY COURT'S CLAIMS REGISTER.

The information you provide on the proof of claim form will be retained by or on behalf of the Bankruptcy Court, the debtor and Kroll Restructuring Administration for as long as necessary for the purposes described above, as needed to resolve disputes or protect legal rights as they relate to such claim, or as otherwise required by law. Some or all of the information you provide on the proof of claim form will be displayed and/or accessible on the debtor's case website hosted by Kroll Restructuring Administration pursuant to applicable law and/or court order. Additionally, such information may be shared with certain third parties affiliated with this matter in furtherance of the bankruptcy case and process. Although you may have certain rights relating to the information provided on the proof of claim form under certain laws, applicable law or court order may prohibit the amendment or erasure of such information once it is submitted, including information displayed and/or accessible at the case website.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Kroll Restructuring Administration and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Kroll Restructuring Administration and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Kroll Restructuring Administration or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Kroll Restructuring Administration and the Clerk of the Court are authorized but not obligated, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

Submission of Claim Data

By using this Site and loading any information to the Site, you agree to release us from any claim or liability with respect to the public display of personal or private information, including but not limited to the types of information listed above.

Claims and creditor information ("Claim Data") must be submitted by a human being and not a script, program, or other method that may be construed as a "bot." Claim Data must be submitted by the creditor or someone authorized to submit such Claim Data on behalf of the creditor. Claim Data must be correct to the best of the creditor's/submitter's knowledge. Filing Claim Data on this Site grants no guarantee of payment.

You represent and warrant that Claim Data submitted by you:

- shall be true, accurate, and complete;
- shall not contain any personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) or other sensitive or potentially embarrassing information, including health care information;
- shall not violate the rights of any third party, including, but not limited to, other proprietary and/or intellectual property rights, or rights of publicity or privacy; shall not violate any law; shall not contain any viruses, Trojan horses, worms, time bombs, bots, or other computer programming routines that are intended to damage, interfere with, or expropriate any system or information; and
- shall not create liability for us or interfere with the operation of the Site.

All information, including information relating to your Claim Data, that is filed electronically, including through this Site, is subject to the same conditions and restrictions as paper based proofs of claim filed with a Bankruptcy Court and are subject to court orders, rules, procedures and applicable law relating to the bankruptcy case in which Claims Data are filed.

Not Legal Advice

WE CANNOT PROVIDE ANY LEGAL ADVICE REGARDING CLAIM DATA OR ON ANY OTHER TOPIC. IF YOU REQUIRE ADVICE REGARDING YOUR RIGHTS OR ANY BANKRUPTCY CASE YOU MAY WISH TO SEEK LEGAL COUNSEL FROM A LICENSED ATTORNEY. USERS OF THIS SITE SHOULD NOT TAKE OR REFRAIN FROM TAKING ANY ACTION BASED UPON CONTENT INCLUDED IN THE SITE. KROLL RESTRUCTURING ADMINISTRATION IS NOT IN THE BUSINESS OF PROVIDING PROFESSIONAL OR LEGAL ADVICE AND INFORMATION CONTAINED ON THIS SITE SHOULD NOT BE RELIED ON AS A SUBSTITUTE FOR FINANCIAL, LEGAL OR OTHER PROFESSIONAL ADVICE. ANY RELIANCE ON THE INFORMATION CONTAINED ON THIS SITE IS SOLELY AT YOUR RISK.

Electronic Signatures

When you submit Claim Data or other information to us, you may be asked to electronically "sign" a form that will set forth certain terms and conditions related to such submission. You hereby agree that your electronic signature in respect of any such submission complies with the U.S. federal ESIGN Act of 2000, and accordingly shall have the same legal effect as your original signature.

For our Terms of Use please click [Terms of Use](#).

Filing Fraudulent Claims

FILING A FRAUDULENT CLAIM IS PUNISHABLE BY A FINE UP TO \$500,000 AND/OR IMPRISONMENT FOR UP TO 5 YEARS (18 U.S.C. 152, 157, AND 3571).

BY SELECTING "I AGREE", YOU CONSENT TO ALL INFORMATION SUBMITTED BEING PUBLICLY DISPLAYED AND/OR ACCESSIBLE ON THE CASE WEBSITE AND THE BANKRUPTCY COURT'S CLAIMS REGISTER.

By selecting I agree below, I confirm that I have read, understand and agree to be bound by the foregoing as well as the Terms of Use.

- ☒ I Agree
☐ Reject

Instructions

Claim Information

1. Who is the current Creditor?

Name of the current creditor (the person or entity to be paid for this claim)

Is the current Creditor an Individual?

- ☐ No
☒ Yes

First Name

Joseph

Middle Name

Michael

Last Name

Hickey

Other names the creditor used with the debtor (if any)

Joseph Hickey

Do you know the creditor's FTX customer main account number?

- ☒ No
☐ Yes

Do you know the creditor's FTX customer email address that was used at sign up?

- ☒ No
☐ Yes

2. Has this claim been acquired from someone else?

- ☒ No
☐ Yes

3. Where should notices and payments to the creditor be sent?

[Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)]

Name:

Joseph Michael Hickey

Address 1 (Street address, "Care of:", or "Attention To:"):

445 Miller Creek Road

Address 2:

Address 3:

Address 4:

City:

San Rafael

State or Province (use 2-letter abbreviation if US or Canada):

CA

Zip Code | Postal Code:

94903

Is the creditor address outside of the US?

- ☒ No
☐ Yes

Contact phone:

8605397372

Contact email:

Should payments go to a different address?

- ☒ No
☐ Yes

Would you like to add any additional addresses for receiving notices about this proof of claim?

- ☒ No
☐ Yes

4. Does this claim amend one already filed?

- ☒ No
☐ Yes

5. Do you know if anyone else has filed a proof of claim for this claim?

- ☒ No
☐ Yes

Additional Claim Information

Provide Information About the Customer Claim as of the Date the Case was Filed (as of November 11, 2022). Please identify the FTX Exchange with respect to where the below cryptocurrency and fiat in Question 7 is held. If you have accounts at more than one FTX Exchange, please file one proof of claim per FTX Exchange. Each such Customer Entitlement Claim pursuant to Question 7 below shall be deemed to have been filed as an identical Customer Entitlement Claim in the same amount against all other Debtors. Accordingly, you do not need to file separate proofs of claim against each Debtor for your Customer Entitlement Claim (Question 7). Please see Question 8 for additional instructions for asserting claims related to Other Activity.

- ☐ FTX Trading Ltd. (d/b/a "FTX") (Case No. 22-11068)
☐ FTX EU Ltd. (f/k/a K-DNA Financial Services Ltd. d/b/a "FTX EU") (Case No. 22-11166)
☐ FTX Japan K.K. (aka "FTX Japan") (Case No. 22-11102)
☒ Quoine Pte Ltd (d/b/a Liquid Global) (Case No. 22-11161)
☐ West Realm Shires Services Inc. (d/b/a "FTX US") (Case No. 22-11071)

6. Did you participate in the FTX Earn program (available via Blockfolio app) as of November 11, 2022?

- ☒ No
☐ Yes

7. List the quantity of each type of cryptocurrency ("Crypto") or fiat currency ("Fiat") held in your account(s) as of November 11, 2022. List any Non-Fungible Tokens ("NFTs") held in your account (s) along with the unique identification code.

- Note that the "USD Rate" is the ratio of the Local Currency to U.S. Dollars.
- If your Crypto or Fiat were part of the peer-to-peer ("P2P") margin lending program, please populate the Loaned Quantity column.

Fiat

ASSERTED QUANTITY FIAT

Fiat (Ticker / Abbreviation)	USD Rate	Total Asserted Quantity of Fiat (Local Currency)	Total Asserted Quantity of Fiat (Converted to USD)
------------------------------	----------	--	--

US Dollar(USD) USD/USD = 1.00000	1.000000 000		
Argentinian Peso (ARS) ARS/USD = 0.006236	0.006236 000		
Australian Dollar (AUD) AUD/USD = 0.661900	0.661900 000		
Brazilian Real (BRL) BRL/USD = 0.187100	0.187100 000		
British Pound Sterling (GBP) GBP/ USD = 1.169200	1.169200 000		
Canadian Dollar (CAD) CAD/USD = 0.750600	0.750600 000		
Euro (EUR) EUR/USD = 1.021000	1.021000 000		
Ghanaian cedi (GHS) GHS/USD = 0.069324	0.069324 000		
Hong Kong Dollar (HKD) HKD/USD = 0.127500	0.127500 000		
Japanese Yen (JPY) JPY/USD = 0.007093	0.007093 000		
Mexican Peso (MXN) MXN/USD = 0.051767	0.051767 000		
Singapore Dollar (SGD) SGD/USD = 0.723500	0.723500 000		
Swiss Franc (CHF) CHF/USD = 1.038000	1.038000 000		
Turkish Lira (TRY) TRY/USD = 0.054091	0.054091 000		
South African rand (ZAR) ZAR/USD = 0.057580	0.057580 000		
Vietnamese dong (VND) VND/USD = 0.000040	0.000040 000		
West African CFA franc (XOF) VXOF/USD = 0.001531	0.001531 000		

Do you want to add any other fiat not previously listed?

- ☐ Yes
☐ No

Loaned Fiat**LOANED QUANTITY FIAT**

Fiat (Ticker / Abbreviation)	USD Rate	Loaned Quantity of Fiat (Local Currency)	Total Loaned Quantity of Fiat (Converted to USD)
US Dollar (USD) USD/USD = 1.00000	1.000000000		
Argentinian Peso (ARS) ARS/USD = 0.006236	0.006236000		
Australian Dollar (AUD) AUD/USD = 0.661900	0.661900000		
Brazilian Real (BRL) BRL/USD = 0.187100	0.187100000		
British Pound Sterling (GBP) GBP/USD = 1.169200	1.169200000		
Canadian Dollar (CAD) CAD/USD = 0.750600	0.750600000		
Euro (EUR) EUR/USD = 1.021000	1.021000000		
Ghanaian cedi (GHS) GHS/USD = 0.069324	0.069324000		
Hong Kong Dollar (HKD) HKD/USD = 0.127500	0.127500000		
Japanese Yen (JPY) JPY/USD = 0.007093	0.007093000		
Mexican Peso (MXN) MXN/USD = 0.051767	0.051767000		
Singapore Dollar (SGD) SGD/USD = 0.723500	0.723500000		
Swiss Franc (CHF) CHF/USD = 1.038000	1.038000000		
Turkish Lira (TRY) TRY/USD = 0.054091	0.054091000		
South African rand (ZAR) ZAR/USD = 0.057580	0.057580000		
Vietnamese dong (VND) VND/USD = 0.000040	0.000040000		
West African CFA franc (XOF) VXOF/USD = 0.001531	0.001531000		

Do you want to add any other fiat not previously listed?

- ☐ Yes
☐ No

Asserted Crypto**Asserted Crypto Tokens**

Crypto (Ticker / Abbreviation)	Asserted Quantity of Crypto
3X Long Bitcoin Token (BULL)	
3X Long Cardano Token (ADABULL)	
3X Long Dogecoin Token (DOGEBULL)	
3X Long Ethereum Token (ETHBULL)	

3X Long XRP Token (XRPBULL)	
Aave (AAVE)	
Akropolis (AKRO)	
ApeCoin (APE)	
ATLAS (ATLAS)	
Atom (ATOM)	
Aurory (AURY)	
Avalanche (AVAX)	
BaoToken (BAO)	
Basic Attention Token (BAT)	
Binance Coin (BNB)	
Bitcoin (BTC)	0.000000450
Bitcoin Cash (BCH)	
Brazilian Digital Token (BRZ)	
Celsius Token (CEL)	
ChainLink Token (LINK)	
Chiliz (CHZ)	
Compound USDT (CUSDT)	
Cope (COPE)	
Crypto.com Coin (CRO)	
Decentraland (MANA)	
Dent (DENT)	
Dogecoin (DOGE)	
Ethereum (ETH)	
EthereumPoW (ETHW)	
Fantom (FTM)	
FTX Token (FTT)	
Gala (GALA)	
Immutable X Token (IMX)	
Kin (KIN)	
Litecoin (LTC)	0.000216560

Luna 2.0 (LUNA2)	
Luna Classic (LUNC)	
Matic (MATIC)	
POLIS (POLIS)	
Polkadot (DOT)	
Raydium (RAY)	
Reserve Rights (RSR)	
Serum (SRM)	
Shiba Inu (SHIB)	
Solana (SOL)	
Spell Token (SPELL)	
Step Finance (STEP)	
SushiSwap (SUSHI)	
Swipe (SXP)	
Terra Classic USD (Wormhole) (USTC)	
The Graph (GRT)	
The Sandbox (SAND)	
Thorchain (RUNE)	
TON Coin (TONCOIN)	
TRON (TRX)	
Uniswap Protocol Token (UNI)	
UpBots (UBXT)	
USD Coin (USDC)	
USD Tether (USDT)	
XRP (XRP)	2,172.339028000

Do you want to add any coin not previously listed?

- ☐ Yes
☒ No

Loaned Crypto

Loaned Quantity of Crypto

Crypto (Ticker / Abbreviation)

Loaned Quantity of Crypto

3X Long Bitcoin Token (BULL)

3X Long Cardano Token (ADABULL)

3X Long Dogecoin Token (DOGEBULL)

3X Long Ethereum Token (ETHBULL)

3X Long XRP Token (XRPBULL)

Aave (AAVE)

Akropolis (AKRO)

ApeCoin (APE)

ATLAS (ATLAS)

Atom (ATOM)

Aurory (AURY)

Avalanche (AVAX)

BaoToken (BAO)

Basic Attention Token (BAT)

Binance Coin (BNB)

Bitcoin (BTC)

Bitcoin Cash (BCH)

Brazilian Digital Token (BRZ)

Celsius Token (CEL)

ChainLink Token (LINK)

Chiliz (CHZ)

Compound USDT (CUSDT)

Cope (COPE)

crypto-loan.com Coin (CRO)

Decentraland (MANA)

Dent (DENT)

Dogecoin (DOGE)

Ethereum (ETH)

EthereumPoW (ETHW)

Fantom (FTM)

FTX Token (FTT)

Gala (GALA)	
Immutable X Token (IMX)	
Kin (KIN)	
Litecoin (LTC)	
Luna 2.0 (LUNA2)	
Luna Classic (LUNC)	
Matic (MATIC)	
POLIS (POLIS)	
Polkadot (DOT)	
Raydium (RAY)	
Reserve Rights (RSR)	
Serum (SRM)	
Shiba Inu (SHIB)	
Solana (SOL)	
Spell Token (SPELL)	
Step Finance (STEP)	
SushiSwap (SUSHI)	
Swipe (SXP)	
Terra Classic USD (Wormhole) (USTC)	
The Graph (GRT)	
The Sandbox (SAND)	
Thorchain (RUNE)	
TON Coin (TONCOIN)	
TRON (TRX)	
Uniswap Protocol Token (UNI)	
UpBots (UBXT)	
USD Coin (USDC)	
USD Tether (USDT)	
XRP (XRP)	

Do you want to add any coin not previously listed?

- ☐ Yes
☐ No

Staked Crypto**Staked Crypto****Crypto (Ticker / Abbreviation)****Staked Quantity of Crypto**

3X Long Bitcoin Token (BULL)

3X Long Cardano Token (ADABULL)

3X Long Dogecoin Token (DOGEBULL)

3X Long Ethereum Token (ETHBULL)

3X Long XRP Token (XRPBULL)

Aave (AAVE)

Akropolis (AKRO)

ApeCoin (APE)

ATLAS (ATLAS)

Atom (ATOM)

Aurory (AURY)

Avalanche (AVAX)

BaoToken (BAO)

Basic Attention Token (BAT)

Binance Coin (BNB)

Bitcoin (BTC)

Bitcoin Cash (BCH)

Brazilian Digital Token (BRZ)

Celsius Token (CEL)

ChainLink Token (LINK)

Chiliz (CHZ)

Compound USDT (CUSDT)

Cope (COPE)

crypto-stak.com Coin (CRO)

Decentraland (MANA)

Dent (DENT)

Dogecoin (DOGE)

Ethereum (ETH)

EthereumPoW (ETHW)

Fantom (FTM)

FTX Token (FTT)

Gala (GALA)

Immutable X Token (IMX)

Kin (KIN)

Litecoin (LTC)

Luna 2.0 (LUNA2)

Luna Classic (LUNC)

Matic (MATIC)

POLIS (POLIS)

Polkadot (DOT)

Raydium (RAY)

Reserve Rights (RSR)

Serum (SRM)

Shiba Inu (SHIB)

Solana (SOL)

Spell Token (SPELL)

Step Finance (STEP)

SushiSwap (SUSHI)

Swipe (SXP)

Terra Classic USD (Wormhole) (USTC)

The Graph (GRT)

The Sandbox (SAND)

Thorchain (RUNE)

TON Coin (TONCOIN)

TRON (TRX)

Uniswap Protocol Token (UNI)

UpBots (UBXT)

USD Coin (USDC)

USD Tether (USDT)

XRP (XRP)

Do you want to add any coin not previously listed?

- ☐ Yes
☐ No

NFTs**NFTs (non-fungible tokens)**

NFT Description	NFT Identifier	Quantity of NFT

8. Do you have Customer Claims related to any Other Activity on the FTX Exchanges? Other Activity would not include quantities of crypto, fiat or NFTs listed in Box 7 above.

- ☒ No
☐ Yes

E-Sign

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☒ I am the creditor.
☐ I am the creditor's attorney or authorized agent.
☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this Proof of Claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this Proof of Claim and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date (Calculated in UTC)

02/04/2025

Name of the person who is completing and signing this claim:

First Name/Middle Name/Last Name:

Joseph Michael Hickey

E-Signature:

Joseph Michael Hickey

I certify that I have completed my Proof of Claim form on the Kroll Restructuring Administration Portal. I hereby agree that my electronic signature herein complies with the ESIGN Act, and accordingly shall have the same legal effect as my original signature.

☒ I agree

Title/Company:

Address 1:

445 Miller Creek Road

Address 2:

City:

San Rafael

State or Province (use 2-letter abbreviation if US or Canada):

CA

Zip Code | Postal Code:

94903

Is this address outside of the US?

☒ No
☐ Yes

Contact phone:

8605397372

Contact email:

jhickeysw@gmail.com

Attachments

Attach Support Documentation (limited to a single PDF attachment that is less than 5 megabytes in size):

- ☒ I have supporting documentation
☐ I do not have supporting documentation

Attach a single PDF attachment that is less than 5 megabytes in size

 Liquid_Balance_Confirmation.pdf

148 KB

File Name

Liquid_Balance_Confirmation.pdf

Submission Information

When you press "Submit" you will receive an email from "noreply.efiling@ra.kroll.com." Please add this email to your allowed senders list. This email will have a PDF copy of your claim filing (with your supporting documents as a separate attachment), as well as an identification number confirming receipt of your claim ("Confirmation ID").

Confirmation of Submission

Your Form has been successfully submitted...

DOCUMENT ID

1de518eecd63f9c5e6a5606e0b6ede9d8a25294b

Submitted Date Time

2025-02-04T05:59:05.835Z

Status

Submitted

CONFIRMATION ID

3265-70-BAOTS-811506405

Exhibit D

Screenshot of Joseph Hickey's account balances in Liquid, as of early February 2025. Used to substantiate the claimed value.



Jason Gunn <jason.gunn@liquid.com>

to me

Hello

Here is the balances you had on Liquid

LTC - 0.00021656

XRP - 2172.339028

BTC - 0.00000045

Hope that helps

Regards

Jason Gunn

Head of Customer Support

www.liquid.com

QUOINE Pre. Ltd. / QUOINE Corporation

Blockchain - Exchange - Payment - Wallet

jason.gunn@liquid.com

...

Feb 3, 2025, 5:00 PM



FROM:

Hickey

4495 Miller Creek Rd

San Rafael, CA 94903

TO:

Clerk of the Court

United States Bankruptcy Court

District of Delaware

824 Market St, 3rd Floor

Wilmington, DE 19801

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